

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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TODD WOLF,

Plaintiff,

v.

Case No. 23-CV-149

CITY OF SHEBOYGAN, et al.,

Defendants.

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**PROPOSED ORDER**

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THE COURT, having considered the arguments, hereby **ORDERS** the following:

1. Plaintiff's motion to compel the City of Sheboygan to permit and produce communications, materials, and information to and from Jill Hall, James Macy, and Charles Adams as set forth herein is **GRANTED**.

2. The City of Sheboygan's disclosures, publications, and arguments constitute a broad waiver of privilege for all communications, materials, and information to and from Jill Hall relating to her investigation between November 7, 2022 – February 8, 2023 under common law and Fed. R. Evid. 502(a).

3. The City of Sheboygan's disclosures, publications, and arguments constitute a broad waiver of privilege for all communications, materials, and information to and from James Macy relating to the subject matters of the January 4, 2023 closed session minutes under common law and Fed. R. Evid. 502(a).

4. The City of Sheboygan's disclosures, publication, and arguments constitute a broad waiver of privilege for all communications, materials, and information to and from Charles Adams

relating to any legal advising or attorney client communications pertaining to the subject matters of the October 17, October 24, November 7, and January 4 closed session meetings, including the leave directives on Wolf, under common law and Fed. R. Evid. 502(a).

5. The City of Sheboygan is compelled to permit discovery and depositions from Jill Hall, James Macy, and Charles Adams for the subjects and matters contained herein.

6. The City is compelled to produce any discovery requested relating to Jill Hall, James Macy, and Charles Adams for the subjects and matters contained herein.

7. The City is compelled to withdraw their relevance objections and supplement their responses and privilege log for communications or documentation not otherwise referenced in this order with specificity.

8. The City of Sheboygan and MWH Law Group are hereby sanctioned under Rule 26(g) for failure to comply with the rules of this Court and Fed. Rs. Civ. P. 26(b)(1) and (5); and are ordered to compensate Plaintiff Todd Wolf his reasonable attorney fees and costs for his motion.

9. Plaintiff Todd Wolf should provide the Court his reasonable attorney fees and costs for this Motion.

**SO ORDERED.**